GRAND CASINO Hinckley

JUL 3 1 2015

July 27, 2015

Environmental Protection Agency Region 5
Air and Radiation Division
Air Programs Branch (AR-18J)
Air Permits Section
77 West Jackson Boulevard
Chicago, IL 60604

Re: Application for Part 71 Permit Renewal and Significant Permit Modification
Permit No. V-ML-2711500031-2010-01

To Whom It May Concern:

Enclosed is an Application for Part 71 Permit Renewal and Significant Permit Modification for Grand Casino Hinckley, located in Hinckley, Pine County, Minnesota. The Part 71 permit expiration date is January 29, 2016. We are also requesting a significant permit modification to change the NOx emission limits for the peaking engines at the facility based on recent stack testing results.

If you have any questions regarding the permit application, please contact me at (320) 384-4907, or bkalk@grcasinos.com. Julie Miller at Barr Engineering Co. may also be contacted at (952) 832-2906 or juliemiller@barr.com.

Sincerely,

Brad Kalk
Vice President of Facilities
Grand Casino Hinckley

Encl.

Cc: Julie Miller, Barr Engineering Co.

Application for Part 71 Permit Renewal and Significant Permit Modification

Prepared for
Grand Casino Hinckley

July 2015

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Application for Part 71 Permit Renewal and Significant Permit Modification

July 2015

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1.0 Introduction

Mille Lacs Corporate Ventures dba/Grand Casino Hinckley is submitting this application for renewal of its Title V Permit to Operate, issued under 40 CFR Part 71. Permit number V-ML-2711500031-2010-01 will expire January 29, 2016. The permit requires a renewal permit application to be submitted at least six months prior to the expiration date. Grand Casino Hinckley is also requesting a Significant Permit Modification to increase its permit limits on emissions of nitrogen oxides (NOx) based on recent stack testing results.

Grand Casino Hinckley owns and operates its facility at 777 Lady Luck Drive, Hinckley, Minnesota 55037. The facility is located on land that is held in trust for the Mille Lacs Band of Ojibwe. The location of the=facility is approximately one and one half mile east of I-35, south of Highway 48 in Pine County, Minnesota.

Grand Casino Hinckley owns and operates three non-emergency internal combustion engines used for peak load management and backup power. The three engines are each Caterpillar Model 3516B turbocharged engines with 16 cylinders each. Each engine operates at a rated speed of 1800 revolutions per minute and produces shaft power of 2,593 brake horsepower. Each engine will burn approximately 130.2 gallons per hour of ultra-low sulfur (0.0015%) diesel fuel when operated at capacity.

The shaft power of each engine drives a 1825 kilowatt generator to produce electricity. The total generation capacity of the engines will be 5.5 megawatts. Electricity generated at the facility will not be sold for distribution.

Grand Casino Hinckley also owns and operates two diesel-fired emergency internal combustion engines used for emergency backup power. The emergency engines are rated at 535 and 960 horsepower.

The facility is currently a synthetic minor source under New Source Review/Prevention of Significant Deterioration (NSR/PSD) regulations because it has taken limits on NOx emissions and operating hours. These limits are federally enforceable in permits PSD-ML-2711500031-2010-02 and V-ML-2711500031-2010-01. The proposed modification for NOx emissions will not cause the facility to exceed major source thresholds and will not cause a significant increase in allowable NOx emissions.

2.0 Permit Application Content

2.1 Identifying Information

Form GIS provides identifying information for the facility including the facility name and address and the name and telephone number of the facility contact person. Form GIS also includes a description of the products, processes and SIC codes for Grand Casino Hinckley, and a summary of potential emissions from the facility. Form CTAC provides a certification of the application by the responsible official for Grand Casino Hinckley. Appendix A contains the EPA Part 71 Federal Operating Permit application forms.

2.2 Source Description

The Grand Casino Hinckley facility consists of a casino and hotel, with several restaurants, a golf course, an RV park, and other amenities. The primary SIC code for the facility is 7011 for hotels and motels. The primary emission sources at the facility are three diesel fired internal combustion engines, which drive generators to provide backup power and peak load management. Grand Casino Hinckley also operates two diesel fired internal combustion engines for emergency backup power. The SIC code for the emission sources is 4911 for electricity production.

2.3 Air Emissions

2.3.1 Emissions of Regulated Air Pollutants

Emissions calculations for all regulated air pollutants are provided in Appendix B. Because of the federally enforceable permit conditions that limit NOx emissions and operating hours for the peaking engines, the facility is not a major source for any regulated air pollutant. Criteria pollutant emission rates for the peaking engines are based on "not-to-exceed" emission factors provided by the manufacturer. Other emission rates are based on emission factors from AP-42 or from 40 CFR Part 98 Mandatory Greenhouse Gas Reporting emission factors.

2.3.2 Identification and Description of Emission Points

Emission sources at the facility include three peaking generators identified as EU 001, EU 002, and EU 003; and two emergency generators identified as EU 004 and EU005. The two emergency generators were previously identified as insignificant emissions sources because their actual annual emissions are less than one ton per year each. Because of amendments to 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, (RICE NESHAP) since the last permit application, the engines are now included as emission sources in this application. EUD-1 forms (see Appendix A) provide information about the generators' manufacturer, model number, and fuel use.

2.3.3 Annual Emission Rates

Annual emission rates are based on actual operating hours from 2014. Emissions from each engine are summarized on the EMISS forms and the PTE form in Appendix A of this application. Detailed emissions calculations are provided in Appendix B.

2.3.4 Fuels and Fuel Use

All five engines use ultra-low sulfur diesel fuel, as required by the RICE NESHAP. Ultra-low sulfur diesel fuel has a sulfur content of 15 ppm or less. EU 001, EU 002, and EU 003 each have a rated fuel consumption of 130.2 gallons per hour when operated at full load.

2.3.5 Operating Schedules

EU 001, EU 002, and EU 003 are limited to 800 hours per year of operation each. They are used for peak load management and to provide emergency backup power for Grand Casino Hinckley. They are tested each month for maintenance purposes. Peak load management occurs during summer months when demand on the utility is highest.

Emergency engines EU 004 and EU 005 are operated for approximately one hour per month for maintenance and testing. They are only used to provide emergency backup power for life safety purposes. They are not used for peak load management, emergency demand response, or as part of a financial arrangement with another entity.

2.3.6 Air Pollution Control Equipment and Compliance Monitoring

EU 001, EU 002, and EU 003 each have a Phillips and Temro diesel oxidation catalyst installed on the exhaust from the engine. The catalyst inlet temperature and differential pressure across the catalyst are continuously monitored for each oxidation catalyst system. The continuous monitoring systems were installed by Wanderlich-Malec. An initial performance test demonstrated that carbon monoxide emissions meet the RICE NESHAP emissions standards. Any deviations from the catalyst inlet temperature and pressure differential operating limitations are reported in the Semiannual Compliance Reports required by the RICE NESHAP.

2.3.7 Operating Limitations

The three peaking generators are limited to 800 hours of operation per year each in the current air permit.

The two emergency generators are limited to the operating conditions in the RICE NESHAP under 40 CFR 63.6640(f):

- There is no time limit in emergency situations.
- Maintenance checks and readiness testing are limited to 100 hours per year.
- Up to 50 hours per year are allowed for non-emergency use, but the 50 hours is included in the 100 hours per year for maintenance and testing.

2.4 Air Pollution Control Requirements

2.4.1 Applicable Requirements

2.4.1.1 New Source Review/Prevention of Significant Deterioration

The facility is a synthetic minor source under New Source Review/Prevention of Significant Deterioration (NSR/PSD) requirements in 40 CFR 52.21. Synthetic minor limits were established in the PSD construction permit for engines EU 001, EU 002, and EU 003.

Table 2-1 Total Facility Potential to Emit (tons/year)

Pollutant	Uncontrolled Potential to Emit	Limited Potential to Emit	Major Source Threshold
Volatile Organic Compounds (VOC)	15.51	1.86	250
Nitrogen Oxides (NOx)	501.91	54.84	250
Carbon Monoxide (CO)	42.03	5.86	250
Particulate Matter < 10 microns (PM10)	9.70	1.28	250
Particulate Matter < 2.5 microns (PM2.5)	8.15	1.12	250
Sulfur Dioxide (SO2)	0.64	0.31	250
Hazardous Air Pollutants (HAPs)	0.36	0.04	10 (single)/ 25 (total)
Carbon Dioxide (CO2)	38,439.87	3,713.47	N/A
Methane (CH4)	1.56	0.15	N/A
Nitrous Oxide (N2O)	0.31	0.03	N/A
Carbon Dioxide equivalents (CO2e)	38,571.78	3,726.21	100,000

2.4.1.2 New Source Performance Standards

Grand Casino Hinckley commenced construction on the engines prior to July 11, 2005 and the engines were manufactured prior to April 1, 2006; therefore, the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines under 40 CFR 60 Subpart IIII do not apply.

2.4.1.3 National Emissions Standards for Hazardous Air Pollutants

The engines are subject to the requirements of the RICE NESHAP for existing engines at an area source of hazardous air pollutants under 40 CFR 63 Subpart ZZZZ. Oxidation catalysts were installed on each of the

non-emergency peaking engines to control emissions of carbon monoxide. A continuous monitoring system monitors catalyst inlet temperature and the pressure drop across the catalyst. An initial performance test was conducted on the engines after the oxidation catalysts were installed. Subsequent performance tests are required every three years.

The emergency engines are exempt from the RICE NESHAP requirements according to 40 CFR 63.6585(f)(2) because they are commercial emergency engines located at an area source of HAP emissions that are not used for emergency demand response or as part of a financial arrangement with another entity.

2.4.2 Test Methods

Every five years, performance testing is required for EU 001, EU 002, and EU 003 to demonstrate compliance with the NOx emissions limits in the air permit. EPA Method 7E is used for testing NOx emissions and Method 19 is used to calculate NOx emissions in pounds per million Btu. Method 3A is used for the determination of oxygen.

In years between performance tests, Grand Casino Hinckley conducts annual testing using the ICAC Test Method for Periodic Monitoring using a portable electrochemical analyzer as specified in the air permit.

The RICE NESHAP requires testing for either the carbon monoxide exhaust concentration or the percent reduction across the catalyst every three years or 8,760 hours of operation, whichever comes first. EPA Method 10 is used for testing carbon monoxide.

2.5 Compliance Plan

An Annual Compliance Certification is submitted by January 30th each year. The Annual Compliance Certification (A-COMP) form with new requirements added for the emergency generators EU 004 and EU 005 is provided in Appendix A. The annual compliance certification describes the compliance status of all applicable requirements.

A requirement that Grand Casino Hinckley is not in compliance with is the NOx emission limit of 6.55 g/bhp-hr for EU 001, EU 002, and EU 003. This emission limit is based on the manufacturer's guaranteed emission rate, but the engines are no longer able to achieve the limit consistently. Grand Casino Hinckley maintains and operates the engines according to the manufacturer's recommendations. The manufacturer does not know of any methods to reduce NOx emissions from the engines. For this reason, Grand Casino Hinckley is proposing to change its emission limits based on recent stack testing results. We are proposing a 30% increase in the emission limits to allow a safety margin for compliance with the limits. No physical or operational changes are proposed for the engines. The facility will remain a synthetic minor source under New Source Review with the proposed changes to the emissions limits.

Engines EU 001, EU 002, and EU 003 continuously monitor intake manifold pressure as an indication that the engines are working properly. Occasionally, the intake manifold pressure is outside of the specified ranges in the air permit. Usually this occurs during engine startup or shutdown. When this occurs, a

maintenance technician is called to evaluate the engine. There is no indication that short periods of low or high intake manifold pressure negatively affects engine operation.

There have been time periods when the continuous monitoring system for the catalyst inlet temperature and pressure differential across the catalyst have failed to record the data because the SD card was out of memory or files were corrupted. The SD cards were recently sent to the vendor for a firmware upgrade and a spare set of SD cards was ordered to minimize downtime for recorded data.

2.6 Acid Rain Requirements

Grand Casino Hinckley does not produce electricity for sale. The electricity produced is only used to provide backup and peaking power for the facility. Acid rain requirements under 40 CFR Part 72 are not applicable.

2.7 Insignificant Activities

Insignificant activities at Grand Casino Hinckley include natural gas combustion for providing building heating and ventilation for human comfort. These insignificant activities are not required to be listed in the permit application according to 40 CFR 71.5(c)(11)(i).

2.8 Significant Permit Modification

2.8.1 Description of the Change

Grand Casino Hinckley is proposing to change its NOx emission limits on engines EU 001, EU 002, and EU 003 based on results from recent stack tests. The engines have not been able to consistently achieve the manufacturer's guaranteed emission rate of 6.55 grams per brake horsepower hour (g/bhp-hr). The engines have been slightly below the 37.44 pounds per hour emission limit. Discussions with the manufacturer indicate that there are no alterations or maintenance that would improve the NOx emission rate. It is possible that the NOx emission rate increased when the engines were switched from low-sulfur diesel to ultra-low sulfur diesel fuel. We are proposing to increase the limits to 8.50 g/bhp-hr and a corresponding hourly emission limit of 48.6 lb/hr. This increase will allow a Grand Casino Hinckley to continue operating the engines in compliance with its emissions limits. There will be no physical or operational changes to the engines. The 800 hour per year operating limit will be retained. Actual emissions are not expected to increase to the level of the proposed emissions limits, but may gradually increase over the current emission rates as the engines age.

2.8.2 Emissions Resulting from the Change

The requested change only affects NOx emission rates because there are no physical or operational changes to the engines.

Table 2-2 Changes in NOx Emissions Limits

Emission Source	Current NOx Emission Limit (g/bhp-hr)	Current NOx Emission Limit (lb/hr)	Current NOx Emission Limit (tons/yr)	Proposed NOx Emission Limit (g/bhp-hr)	Proposed NOx Emission Limit (lb/hr)	Proposed NOx Emission Limit (tons/yr)
EU 001	6.55	37.44	14.98	8.5	48.6	19.4
EU 002	6.55	37.44	14.98	8.5	48.6	19.4
EU 003	6.55	37.44	14.98	8.5	48.6	19.4
Total	N/A	112.33	44.93	N/A	145.8	58.3

The requested change results in an increase of 33.5 lb/hr and 13.4 tons/yr for potential emissions from the peaking engines. The potential increase is less than the significant emission rate of 40 tons/yr for NOx under PSD requirements. The facility will remain a synthetic minor source because total facility NOx limited emissions remain less than 250 tons per year. Actual emissions are not expected to increase to the level of the proposed emissions limits, but may gradually increase over the current emission rates as the engines age.

2.8.3 New Applicable Requirements

The proposed change does not affect the applicability of New Source Performance Standards under 40 CFR 60 Subpart IIII. The change does not qualify as a modification because there will be no physical or operational change to the engines.

The proposed change also does not affect the applicability of the RICE NESHAP under 40 CFR 63 Subpart ZZZZ because the engines are not undergoing a reconstruction. Engines EU 001, EU 002, and EU 003 remain "existing" engines located at an area source of hazardous air pollutants.

Appendix A

Permit Application Forms

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 6/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Kalk (First) Bradley (MI) ____

Title Vice President of Facilities

Street or P.O. Box 777 Lady Luck Drive

City Hinckley State MN ZIP 55037 - ____

Telephone (320) 384 - 4907 Ext. ____ Facsimile (320) 384 - 4857

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Bradley Kalk

Name (typed) Bradley Kalk Date: 7 / 27 / 2015

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name Grand Casino Hinckley

Mailing address: Street or P.O. Box 777 Lady Luck Drive

City Hinckley State MN ZIP 55037 -

Contact person: Bradley Kalk Title Vice President of Facilities

Telephone (320) 384 - 4907 Ext.

Facsimile (320) 384 - 4857

B. Facility Location

Temporary source? ___Yes _X_ No Plant site location 777 Lady Luck Drive

City Hinckley State MN County Pine EPA Region 5

Is the facility located within:

Indian lands? _X_ YES ___ NO OCS waters? ___YES _X_ NO

Non-attainment area? ___ YES _X_ NO If yes, for what air pollutants?

Within 50 miles of affected State? _X_ YES __ NO If yes, What State(s)? WI

C. Owner

Name Mille Lacs Corporate Ventures dba/Grand Casino Hinckley Street/P.O. Box 777 Lady Luck Drive

City Hinckley State MN ZIP 55037 -

Telephone (320) 523 - 8882 Ext

D. Operator

Name Same as owner Street/P.O. Box

City State ZIP -

Telephone ( ) - Ext

E. Application Type

Mark only one permit application type and answer the supplementary question appropriate for the type marked.

___Initial Permit _X_ Renewal _X_ Significant Mod ___ Minor Permit Mod(MPM)

___ Group Processing, MPM ___ Administrative Amendment

For initial permits, when did operations commence? _____/_____/_____

For permit renewal, what is the expiration date of current permit? _01_/_29_/_16_

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

___ SIP ___ FIP/TIP __ PSD ___Non-attainment NSR

_X_ Minor source NSR ___ Section 111 ___ Phase I acid rain ___Phase II acid rain

___ Stratospheric ozone ___ OCS regulations _X_ NESHAP ___ Sec. 112(d) MACT

___ Sec. 112(g) MACT ___ Early reduction of HAP ___ Sec 112(j) MACT ___ RMP [Sec.112(r)]

___ Tank Vessel requirements, sec. 183(f)) ___ Section 129 Standards/Requirement

___ Consumer / comm.. products, ' 183(e) ___ NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? ___YES _X_NO Regulatory agency _____

Phase II acid rain application submitted? ___YES _X_NO If yes, Permitting authority _____

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Hotels and motels		7011
Electricity generation		4911

I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should by listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
001	Non-emergency Peaking Generator Set
002	Non-emergency Peaking Generator Set
003	Non-emergency Peaking Generator Set
004	Emergency Generator
005	Emergency Generator

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx 68.2 tons/yr VOC 1.9 tons/yr SO2 0.3 tons/yr

PM-10 1.2 tons/yr CO 5.8 tons/yr Lead 0 tons/yr

Total HAP 0.0 tons/yr

Single HAP emitted in the greatest amount Benzene PTE 0.02 tons/yr

Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE 12 tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s) PSD-ML-271150031-2010-02 Permit type Construction Permitting authority EPA Region 5

Permit number(s) V-ML-2711500031-2010-01 Permit type Operation Permitting authority EPA Region 5

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit _____

Check one: ___ Application made ___ Coverage granted

General permit identifier _____ Expiration Date ____/____/____

M. Cross-referenced Information

Does this application cross-reference information? __ YES _X_ NO (If yes, see instructions)

INSTRUCTIONS FOLLOW

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID 001 Description Generator Set

SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Peak load management and backup power Temporary Source ___Yes _X_ No

Manufacturer Caterpillar Model No. 3516B

Serial Number OFDN00430 Installation Date 12 / 04 / 2004

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Diesel	0.0015%		137,000 Btu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Diesel	33,071 gallons	130.2 gallons	1,140,552 gallons

E. Associated Air Pollution Control Equipment

Emissions unit ID 001 Device type Oxidation catalyst

Air pollutant(s) Controlled Carbon monoxide Manufacturer Phillips and Temro

Model No. Serial No.

Installation date 10 / / 2013 Control efficiency (%) >70%

Efficiency estimation method Initial performance test

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) 26 . 00	Inside stack diameter (ft) 1 . 33
Stack temp(°F) 899 . 00	Design stack flow rate (ACFM) 15676 . 00
Actual stack flow rate (ACFM) 15676 . 00	Velocity (ft/sec) 187 . 00

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID 002 Description Generator Set

SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Peak load management and backup power Temporary Source ___Yes _X_ No

Manufacturer Caterpillar Model No. 3516B

Serial Number OFDN00427 Installation Date 12 / 04 / 2004

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Diesel	0.0015%		1387,000 Btu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Diesel	33,071 gallons	130.2 gallons	1,140,552 gallons

E. Associated Air Pollution Control Equipment

Emissions unit ID 002 Device type Oxidation catalyst

Air pollutant(s) Controlled Carbon monoxide Manufacturer Phillips and Temro

Model No. Serial No.

Installation date 10 / / 2013 Control efficiency (%) >70%

Efficiency estimation method Initial performance test

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) 26 . 00	Inside stack diameter (ft) 1 . 33
Stack temp(°F) 899 . 00	Design stack flow rate (ACFM) 15676 . 00
Actual stack flow rate (ACFM) 15676 . 00	Velocity (ft/sec) 187 . 00

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID 003 Description Generator Set

SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Peak load management and backup power Temporary Source ___Yes _X_ No

Manufacturer Caterpillar Model No. 3516B

Serial Number OFDN00431 Installation Date 12 / 04 / 2004

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Diesel	0.0015%		137,000 Btu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Diesel	33,071 gallons	130.2 gallons	1,140,552 gallons

E. Associated Air Pollution Control Equipment

Emissions unit ID 002 Device type Oxidation catalyst

Air pollutant(s) Controlled Carbon monoxide Manufacturer Phillips and Temro

Model No. Serial No.

Installation date 10 / / 2013 Control efficiency (%) >70%

Efficiency estimation method Initial performance test

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) 26 . 00	Inside stack diameter (ft) 1 . 33
Stack temp(°F) 899 . 00	Design stack flow rate (ACFM) 15676 . 00
Actual stack flow rate (ACFM) 15676 . 00	Velocity (ft/sec) 187 . 00

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID EU 004 Description Emergency Generator 535 hp

SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Emergency lighting and elevators Temporary Source ___Yes _X_ No

Manufacturer Detroit V-16 Model No. D650FRX4

Serial Number XN3866345-02 P-38932 Installation Date___/___/ 1992

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

EUD-1

C. Fuel Data

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Diesel	0.0015%		137,000 Btu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage (*estimated*)	Maximum Usage (*estimated*)	
		Hourly	Annual
Diesel	200 gallons	20 gallons	10,000 gallons

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date_____/_____/_____ Control efficiency (%) _____

Efficiency estimation method_____

EUD-1

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____._____	Inside stack diameter (ft) _____._____
Stack temp(°F) _____._____	Design stack flow rate (ACFM) _____._____
Actual stack flow rate (ACFM) _____._____	Velocity (ft/sec) _____._____

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EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID EU 005 Description Emergency Generator 960 hp

SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Emergency lighting and elevators Temporary Source ___Yes _X_ No

Manufacturer CUMMINS Model No. NPA855G3

Serial Number 11853801 Installation Date___/___/ 1997

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

EUD-1

C. Fuel Data

Primary fuel type(s) Diesel Standby fuel type(s) N/A

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Diesel	0.0015%		137,000 Btu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage *(estimated)*	Maximum Usage *(estimated)*	
		Hourly	Annual
Diesel	200 gallons	20 gallons	10,000 gallons

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date_____/_____/_____ Control efficiency (%) _____

Efficiency estimation method_____

EUD-1

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____._____ Inside stack diameter (ft) _____._____

Stack temp(°F) _____._____ Design stack flow rate (ACFM) _____._____

Actual stack flow rate (ACFM) _____._____ Velocity (ft/sec) _____._____

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 001

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.1	1.1	0.5	
NOx	3.9	48.6	19.4	
CO	0.3	3.0	1.2	
PM	0.1	0.9	0.3	
PM10	0.1	0.7	0.3	
PM2.5	0.1	0.6	0.2	
GHG – CO2	328.7	2,908.4	1,163.4	
GHG – CH4	0.0	0.1	0.0	
GHG – N20	0.0	0.0	0.0	

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 001

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
SO2	0.0	0.0	0.0	
HAP - Benzene	0.0	0.0	0.0	71432
HAP - Toluene	0.0	0.0	0.0	108883
HAP - Xylene	0.0	0.0	0.0	1330207
HAP - Formaldehyde	0.0	0.0	0.0	50000
HAP - Acetaldehyde	0.0	0.0	0.0	75070
HAP - Acrolein	0.0	0.0	0.0	107028
HAP - Napthalene	0.0	0.0	0.0	91203

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 002

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.1	1.1	0.5	
NOx	3.7	48.6	19.4	
CO	0.3	3.0	1.2	
PM	0.1	0.9	0.3	
PM10	0.1	0.7	0.3	
PM2.5	0.1	0.6	0.2	
GHG – CO2	328.7	2,908.4	1,163.4	
GHG – CH4	0.0	0.1	0.0	
GHG – N20	0.0	0.0	0.0	

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 002

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
SO2	0.0	0.0	0.0	
HAP - Benzene	0.0	0.0	0.0	71432
HAP - Toluene	0.0	0.0	0.0	108883
HAP - Xylene	0.0	0.0	0.0	1330207
HAP - Formaldehyde	0.0	0.0	0.0	50000
HAP - Acetaldehyde	0.0	0.0	0.0	75070
HAP - Acrolein	0.0	0.0	0.0	107028
HAP - Napthalene	0.0	0.0	0.0	91203

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 003

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.1	1.1	0.5	
NOx	3.5	48.6	19.4	
CO	0.3	3.0	1.2	
PM	0.1	0.9	0.3	
PM10	0.1	0.7	0.3	
PM2.5	0.1	0.6	0.2	
GHG – CO2	328.7	2,908.4	1,163.4	
GHG – CH4	0.0	0.1	0.0	
GHG – N20	0.0	0.0	0.0	

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 003

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
SO2	0.0	0.0	0.0	
HAP - Benzene	0.0	0.0	0.0	71432
HAP - Toluene	0.0	0.0	0.0	108883
HAP - Xylene	0.0	0.0	0.0	1330207
HAP - Formaldehyde	0.0	0.0	0.0	50000
HAP - Acetaldehyde	0.0	0.0	0.0	75070
HAP - Acrolein	0.0	0.0	0.0	107028
HAP - Napthalene	0.0	0.0	0.0	91203

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 004

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.0	1.3	0.3	
NOx	0.1	16.6	4.1	
CO	0.0	3.6	0.9	
PM	0.0	1.2	0.3	
PM10	0.0	1.2	0.3	
PM2.5	0.0	1.2	0.3	
GHG – CO2	3.1	615.3	153.8	
GHG – CH4	0.0	0.0	0.0	
GHG – N20	0.0	0.0	0.0	

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 004

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
SO2	0.0	1.1	0.3	
HAP - Benzene	0.0	0.0	0.1	71432
HAP - Toluene	0.0	0.0	0.0	108883
HAP - Xylene	0.0	0.0	0.0	1330207
HAP - Formaldehyde	0.0	0.0	0.1	50000
HAP - Acetaldehyde	0.0	0.0	0.1	75070
HAP - Acrolein	0.0	0.0	0.0	107028
HAP - Napthalene	0.0	0.0	0.0	91203

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 005

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.0	0.6	0.2	
NOx	0.1	23.0	5.8	
CO	0.0	5.3	1.3	
PM	0.0	0.7	0.2	
PM10	0.0	0.4	0.1	
PM2.5	0.0	0.4	0.1	
GHG – CO2	5.6	1,113.6	278.4	
GHG – CH4	0.0	0.0	0.0	
GHG – N20	0.0	0.0	0.0	

United States Environmental Protection Agency

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 005

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
SO2	0.0	0.0	0.0	
HAP - Benzene	0.0	0.0	0.0	71432
HAP - Toluene	0.0	0.0	0.0	108883
HAP - Xylene	0.0	0.0	0.0	1330207
HAP - Formaldehyde	0.0	0.0	0.0	50000
HAP - Acetaldehyde	0.0	0.0	0.0	75070
HAP - Acrolein	0.0	0.0	0.0	107028
HAP - Napthalene	0.0	0.0	0.0	91203

EPA United States Environmental Protection Agency

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POTENTIAL TO EMIT (PTE)

For each unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below and sum them up to show totals for the facility. You may find it helpful to complete form **EMISS** before completing this form. Show other pollutants not listed that are present in major amounts at the facility on attachment in a similar fashion. You may round values to the nearest tenth of a ton. Also report facility totals in section **J** of form **GIS**.

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
001	19.4	0.5	0.0	0.3	1.2	0.0	0.0
002	19.4	0.5	0.0	0.3	1.2	0.0	0.0
003	19.4	0.5	0.0	0.3	1.2	0.0	0.0
004	4.1	0.3	0.3	0.3	0.9	0.0	0.0
005	5.8	0.2	0.0	0.1	1.3	0.0	0.0
FACILTY TOTALS	68.2	1.9	0.3	1.2	5.8	0.0	0.0

EPA United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

A. GENERAL INFORMATION

Permit No. PSD-ML-2711500031-2010-02 / V-ML-2711500031-2010-01

Reporting Period: Beg. 01 / 01 / 2014 End. 12 / 31 / 2014

Source / Company Name Grand Casino Hinckley / Mille Lacs Corporate Ventures

Mailing Address: Street or P.O. Box 777 Lady Luck Drive

City Hinckley State MN ZIP 55037 -

Contact person Bradley Kalk Title Vice President of Facilities

Telephone (320) 384 - 4907 Ext.

Continued on next page

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.a.1. NOx emission rate. Limit NOx emissions at all times to no greater than 6.55 grams per brake horsepower-hour (g/BHP-hr) per engine, expressed as NO2, averaged over the duration of the emission performance test or any three consecutive hours.

Compliance Methods for the Above (Description and Citation):
Annual testing was conducted on May 21, 2014 to demonstrate compliance with NOx emission limits in accordance with Section 3.0.c. and d. of the permit. The test report was submitted June 30, 2014. Engines 001, 002, and 003 failed to demonstrate compliance with the 6.55 g/bhp-hr limit during the compliance test, but all three engines demonstrated compliance with the 37.44 lb/hr limit.

Maintenance performed on the engines following the test has not indicated any reason why NOx emissions would have increased since the performance test in 2010 or exceed the manufacturer's specifications. Annual testing was completed with a portable analyzer according to the ICAC method specified in the permit; therefore, the results may not be as accurate as would be obtained using EPA Method 7E. Five-year performance testing using Method 7E and conducted on April 12-13, 2010 at Grand Casino Hinckley demonstrated compliance with all of the NOx emission limits.

Since the pounds per hour limit was not exceeded, the engines at Grand Casino Hinckley are not harming the environment or causing any additional risk to human health.

Status (Check one): _X_ Intermittent Compliance __ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.a.2. NOx emission rate. Limit NOx emissions at all times to no greater than 37.44 pounds per hour (lb/hr) per engine, expressed as NO2, averaged over the duration of the emission performance test or any three consecutive hours.

Compliance Methods for the Above (Description and Citation):
Annual testing was conducted on May 21, 2014 to demonstrate compliance with NOx emission limits in accordance with Section 3.0.c. and d. of the permit. The test report was submitted June 30, 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.a.3. NOx emission limit. Limit NOx emissions to no greater than 14.98 tons per year (tpy) per engine, expressed as NO2, calculated based on a 12-month rolling sum. Compliance with this limit shall be based on a rolling sum of monthly emissions during the previous 12 months.

Compliance Methods for the Above (Description and Citation):
Compliance with the NOx emission limit is calculated monthly based on monthly operating hours and the NOx emission rate determined by annual testing. Records of monthly reports are kept at the facility as required by Section 4.0.b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.a.4. CO concentration or reduction. Limit concentration of CO in the exhaust to 23 ppmvd CO at 15% O2 or reduce CO emissions by 70% or more at all times except during periods of startup. This requirement becomes effective on May 3, 2013.

Compliance Methods for the Above (Description and Citation):
The initial performance test demonstrated compliance on October 22 and 23, 2013.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.1. Engine operating hours. Limit operating hours of EU 001, 002, and 003 to no greater than 800 hours per year based on a 12-month rolling sum. Compliance with that limit shall be based on a rolling sum of monthly operating hours during the previous 12 months.

Compliance Methods for the Above (Description and Citation):
Compliance with operating hours limit is calculated monthly based on run data from the engines. Records of monthly reports are kept at the facility as required by Section 4.0.b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.2. Turbocharger and aftercooler operation. Use a turbocharger and aftercooler at all times during operation of EU 001, 002, and 003.

Compliance Methods for the Above (Description and Citation):
An alarm would alert the operator if the aftercooler or turbocharger were not operating. Engine run data is reviewed monthly to ensure compliance. Records of monthly reports are kept at the facility as required by Section 4.0.b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.3. Maintain the aftercooler return water temperature for each engine at less than or equal to 140 degrees Fahrenheit.

Compliance Methods for the Above (Description and Citation):
An alarm would alert the operator if the aftercooler return water temperature exceeded 140 degrees F. Engine run data is reviewed monthly to ensure compliance. Records of monthly reports are kept at the facility as required by Section 4.0.b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.4. Combustion operation. Operate each emission unit in lean burn combustion conditions at all times.

Compliance Methods for the Above (Description and Citation):
The engines are designed and operated using lean burn combustion conditions. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.5. Maintain the intake manifold pressure at 28.1 to 76.2 inches of mercury (Hg) for 40 to 100% load for each engine. Each engine shall operate only between 40 to 100% load.

Compliance Methods for the Above (Description and Citation):
Engine 001 had one 15-minute interval of low boost pressure. An alarm alerts the operator if the intake manifold pressure is not within the limits when the engine is operating between 40 and 100 percent load. The manufacturer's published tolerance limit for the pressure gauge is +/- 10% due to variations in ambient air and fuel used. The engine is guaranteed is to meet its emission standards within these tolerance limits. Records of monthly reports are kept at the facility as required by Section 4.0.b. of the permit.

Status (Check one): _X_ Intermittent Compliance ___ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.6. Retard engine timing. At all times operate EU 001, 002, and 003 at Retard Engine Timing which involves delaying the injection of fuel in the engine.

Compliance Methods for the Above (Description and Citation):
The engines are designed and operated with retard engine timing. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.7. Set the flash file program #180-1736, which electronically controls each engine, for retard engine timing. Contact the EPA before modifying any parameters pertaining to retard engine timing for any of the engines.

Compliance Methods for the Above (Description and Citation):
The engines are designed and operated with flash file #180-1736. There have been no modifications to the engines' flash files. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.8. Preventive action. In any shutdown or breakdown of EU 001, 002, or 003 or deviation from any permit terms, the owner or operator shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant.

Compliance Methods for the Above (Description and Citation):
Aftercooler return water temperature and intake manifold pressure are continuously monitored as an indication of engine performance (Sections 2.0.b.3. and 5.) For any unexpected shutdown, any breakdown, or any malfunction, the operator is notified immediately and maintenance is conducted on the engine. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.9. Compliance. Nothing in this permit allows the operation of an emission facility, emissions unit, or stationary source which may endanger human health or the environment; or allows the owner or operator of an emission facility to violate an applicable requirement or compliance document.

Compliance Methods for the Above (Description and Citation):
Grand Casino Hinckley operates the facility using good air pollution control practices. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.10. Fuel requirements. Use diesel fuel that meets the following standards:
a. Sulfur content: 15 ppm maximum.
b. A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

Compliance Methods for the Above (Description and Citation):
Records are kept of fuel purchases.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.11. Engine idling. minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the CO emission limitation in Section 2.0(A)(4) of this permit shall apply to all times.

Compliance Methods for the Above (Description and Citation):
The engine is not run at idle speed after startup.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 2.0.b.12. General Practices. At all times, the Permitee shall maintain the facility in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Compliance Methods for the Above (Description and Citation):
Grand Casino Hinckley the facility using good air pollution control practices. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.a. Continuously monitor the aftercooler water temperature.

Compliance Methods for the Above (Description and Citation):
An alarm would alert the operator if the return water temperature exceeded 140 degrees F. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.b. Continuously monitor the intake manifold pressure.

Compliance Methods for the Above (Description and Citation):
The intake manifold pressure was not recorded during one 33 minute interval. An alarm alerts the operator if the intake manifold pressure is not within the limits when the engine is operating between 40 and 100 percent load. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): _X_ Intermittent Compliance ___ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.c. Performance testing on each emission unit shall be conducted to ascertain compliance with the NOx emission rates and limits in Section 2.0(A) in accordance with the requirements set forth later in this section. Determine the NOx emission rate, expressed as NO2, using exhaust properties determined by both Method 19 of 40 C.F.R. Part 60 (unless otherwise approved by EPA) and exhaust gas measurements as set out in later in this section.

Compliance Methods for the Above (Description and Citation):
Performance testing was conducted on April 12-13, 2010 to demonstrate compliance with NOx emission limits in accordance with Section 3.0.c. and d. of the permit. Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.d. Periodic Performance Tests shall be conducted every five (5) calendar years to determine compliance with the applicable NOx emissions limits in Section (2.0)(A) and furnish the EPA with a written report of the results of such performance test(s).

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.e. Testing Notification. Written notification of the planned test date shall be postmarked or received by the EPA at least 30 days before the planned test date. The EPA shall reject the results of a test if less than 30 days notice is given unless written authorization of a shorter notice was given by the EPA Regional office.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.f. Test Plans. Within 60 days after receiving a request from EPA for inspections, monitoring, and/or entry under section 114 of the Act, and at least 30 days before the scheduled date of any tests, the owner or operator shall submit a complete plan for conducting the source tests to the EPA for approval. The plan must address the methods and procedures to be used for sampling, testing, and quality assurance, and the operational conditions under which the tests will be performed and documented. Failure to submit a complete plan shall not alter the date by which any test is required.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.g. De minimis Pollutants. Conduct performance tests, upon request of the EPA, for SO_2, VOCs, CO, PM, PM_{10}, and HAPs in order to determine whether the actual emission levels represent the limited potential emissions estimated in Table 3 in Section 1.0 of this permit.

Compliance Methods for the Above (Description and Citation):
EPA has not requested performance testing for SO_2, VOCs, CO, PM, PM_{10} or HAPs.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.h. Approval of Test Plan. The owner or operator shall submit to the EPA a test plan with or in advance of the test notification required under this section or in response to the EPA's request for supplemental information If the proposed test plan does not contain sufficient or accurate enough detail to ensure that the performance test meets the requirements of the applicable requirement or compliance document, EPA may reject the plan, and the owner or operator must address any of EPA's comments on revisions and additions that are necessary to make the plan complete.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.i. Format and content of test plan. The test plan shall be submitted in the format and include the elements specified in the Part 71 permit.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.j. Pretest meeting. The owner or operator shall contact EPA Region 5 to schedule a pretest meeting to be held between authorized employees of the agency and the owner or operator of the facility. The pretest meeting shall be held at least seven days prior to the performance test date except that a shorter period shall be allowed if the EPA is able to accommodate a request for such a meeting. If the EPA agrees that an in-person meeting is not necessary, the pretest meeting will be conducted by telephone conference call unless the owner or operator of the emission facility requests and in-person meeting.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance __X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.k. Representative Testing Conditions. Performance tests shall be conducted under such conditions as the EPA shall specify to the plant operator based on representative performance (i.e., not during startup, shutdown or malfunction) of the affected facility. The owner or operator shall make available to the EPA such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance __X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.l. Operating Conditions for Performance Testing. All performance tests shall be conducted at worst case operating (non-malfunction) conditions for all emission units for each air pollutant that is required to be tested unless: 1. the applicable requirement or compliance document specifies alternative operating conditions for performance testing; or 2. the worst case condition is not known or calculable. In this case, worst case conditions shall be assumed to be the maximum achievable process or operating rate of the emissions unit.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance __X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.m. Test Runs. Unless otherwise specified by the applicable Reference Test Method, each performance test shall consist of three separate runs. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the EPA's approval, be determined using the arithmetic mean of the results of the two other runs.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance __X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.n. Failure to demonstrate compliance. Upon the EPA's written notice that the facility has failed to demonstrate compliance with an applicable emissions limit, the owner or operator of the emission facility, unless an alternative schedule is given in an applicable requirement or compliance document, shall: 1. Conduct a retest within 30 days of receipt of the EPA written notice; 2. Submit to the EPA written notice of testing, submit a test plan for the retest, and schedule a pretest meeting at least 21 days in advance of the date of the retest. The pretest meeting shall be held at least 7 days prior to the date of the retest. 3. Submit a complete report of the results with 45 days.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X___ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.n. Extension – Failure to demonstrate compliance. The owner or operator may receive an extension to the schedule if one of the following special circumstances applies: 1. Seasonal or temporary shutdown of the affected emissions units; 2. Malfunction or breakdown of the affected units; 3. Weather conditions that prevent using the applicable test methods or prevent operation of the affected emission units at the required operating conditions. 4. Any other conditions beyond the control of the owner or operator that prevent using the applicable test methods or prevent operation of the affected units at the required operating conditions or completion of a retest within the required schedule.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance _X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.o. Request for a Retest Extension. Any request for an extension of the time schedule shall be submitted to the EPA in writing by the owner or operator prior to the date by which retesting is required. The request shall specify the reason why the extension is needed, and include an alternative retest schedule. The EPA shall grant the request for extension if the EPA finds that one or more of the special conditions apply. A requested extension shall not be effective unless the EPA has given written approval of the extension.

Compliance Methods for the Above (Description and Citation):
Performance testing was not required in 2014.

Status (Check one): ___ Intermittent Compliance __X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.p. Agency tests. Upon request of the EPA, the owner or operator of an emission facility shall allow the EPA, or any authorized employee or agent of the EPA, to enter upon the premises for the purposes of conducting performance tests. The owner or operator shall provide performance testing facilities that enable the EPA to conduct performance tests. The owner or operator shall operate the emission facility at worst case operating conditions as requested by the EPA and shall provide assistance as requested.

Compliance Methods for the Above (Description and Citation):
EPA has not requested to conduct additional performance tests.

Status (Check one): ___ Intermittent Compliance __X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.q. Annual Testing. The owner or operator shall measure NOx emissions annually (at about the anniversary of the initial compliance test) using a portable emissions analyzer to determine compliance with the applicable NOx emissions limits and furnish the EPA with a written report of the results. The portable emissions analyzer shall be used according to the Portable Electrochemical Analyzer Procedure in available at http://www.epa.gov/ttn/emc/ctm/ctm-034.pdf. This requirement does not apply during the calendar years in which a performance test is required, only during years between the periodic performance tests.

Compliance Methods for the Above (Description and Citation):
Annual testing was conducted on May 21, 2014 to demonstrate compliance with NOx emission limits in accordance with Section 3.0.c. and d. of the permit.

Status (Check one): ___ Intermittent Compliance __X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.r. Test Reports. Within 45 days after completion of a set of NOx emissions measurements, the owner or operator shall submit a copy of the results to the EPA.

Compliance Methods for the Above (Description and Citation):
Section 3.0.r. and 5.0.a. The annual test report was submitted on June 30, 2014.

Status (Check one): ___ Intermittent Compliance _X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.t. Operating Conditions. All measurements shall be conducted at worst case operating (non-malfunction) conditions for all emission units that are required to be tested unless: 1. the applicable requirement or compliance document specified alternative operating conditions for annual testing using a portable emissions analyzer; or 2. the worst case condition is not known or calculable. In this case, worst case conditions shall be assumed to be the maximum achievable process or operating rate of the emissions unit.

Compliance Methods for the Above (Description and Citation):
Annual testing was conducted with the engines operating under normal operating conditions.

Status (Check one): _X__ Intermittent Compliance ___ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.u. Measurement Cycles. Each test shall consist of at least 4, but no more than 6, 15-minute measurement cycles. For the purpose of determining compliance with the applicable standard, the results of all measurement cycles will be averaged. In the event that conditions occur in which one of the measurement cycles must be discontinued because of forced shutdown, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, EPA may, determine compliance using the arithmetic mean of the results of the non-damaged measurement cycles.

Compliance Methods for the Above (Description and Citation):
Annual testing on each engine consisted of four, 15-minute measurement cycles. The results for each engine were averaged.

Status (Check one): ___ Intermittent Compliance _X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.v. Initial performance test for CO. Conduct an initial performance test under paragraphs 3.0(x) or (y) with 180 days after May 3, 2013.

Compliance Methods for the Above (Description and Citation):
Initial Performance Testing was conducted October 22 and 23, 2013.

Status (Check one): ___ Intermittent Compliance _X__ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.w. Subsequent performance test for CO. Conduct a performance test under paragraphs (x) or (y) of this Section every 8,760 hours or 3 years, whichever comes first.

Compliance Methods for the Above (Description and Citation):
Initial performance testing was conducted October 22 and 23, 2013.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.x. Measurement of CO reduction. If complying with the CO reduction clause of Section 2.0(A)(4) of this permit, measure both O2 and CO at the inlet and outlet of the control device using a portable CO and O2 analyzer in accordance with ASTM D6522-00 (2005) or, for CO, Method 10 of 40 C.F.R. Appendix A. Measurements to determine O2 must be made at the same time as the measurements for CO concentration. The CO concentration must be at 15 percent O2, dry basis.

Compliance Methods for the Above (Description and Citation):
Not applicable – CO concentration was measured during the initial performance test.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.y. Measurement of CO concentration. If complying with the CO concentration clause of Section 2.0(A)(4) of this Permit, do the following: 1.Select the sampling port location and the number of traverse points using Method 1 or 1A of 40 C.F.R. Part 60, Appendix A; 2. Determine the O2 concentration of the stationary RICE exhaust at the sampling port location using Method 3 or 3A or 3B of 40 C.F.R. Part 60, Appendix A, or ASTM Method D6522-00(2005); 3. Measure moisture content of the stationary RICE exhaust at the sampling port location using Method 4 of 40 C.F.R. Part 60, Appendix A, or Test Method 320 of 40 C.F.R. Part 63, Appendix A, or ASTM D 6348-03; and 4. Measure CO at the exhaust of the stationary RICE Method 10 of 40 C.F.R. Part 60, Appendix A, ASTM Method D6522-00 (2005), Method 320 of 40 C.F.R. Part 63, Appendix A, or ASTM D6348-03. CO concentration must be at 15 percent O2, dry basis. Results of this test consist of the average of the three 1-hour longer runs.

Compliance Methods for the Above (Description and Citation):
Initial performance testing determined that the CO concentration meets the limit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.z. Notification of CO performance test. Provide notice of intent to conduct a performance test under paragraphs (v) or (w) of this Section at least 60 calendar days before the performance test is initially scheduled to begin to allow EPA, upon request, to review and approve the site-specific test plan required under paragraph (aa) of this Section and to have an observer present during the test. In the event the Permittee is unable to conduct the performance test on the date specified due to unforeseeable circumstances beyond the Permittee's control, the Permittee shall notify the Administrator as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled.

Compliance Methods for the Above (Description and Citation):
The notification and test protocol were submitted August 9, 2013.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 3.0.aa. Submission of CO test Plan. Before conducting a required performance test under paragraphs (v) or (w) of this Section, submit a site-specific test plan at least 60 calendar days before the performance test is scheduled to take place, that is, simultaneously with the notification of intention to conduct a performance test required under paragraph (z) of this Section.

Compliance Methods for the Above (Description and Citation):
The notification and test protocol were submitted August 9, 2013.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 4.0.a. Maintain records, which include printouts of digital readouts, gauges, or meters, for times in which the flash file program #180-1736 is modified and any times in which any retard engine timing parameters have been changed.

Compliance Methods for the Above (Description and Citation):
Section 2.0.b.7. and 4.0.a. The flash file #180-1736 and retard engine timing parameters have not been changed for any of the engines.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 4.0.b. Record keeping. Maintain a file at the Facility Location of the records that are required to be retained. The owner or operator shall retain all records at the Facility Location for at least five (5) years following the creation of such record. Records which must be retained at this location include all calibration and maintenance records, all original recording for continuous monitoring instrumentation, and copies of all reports required by this permit. Records of all monitoring required by this permit, and information about the monitoring, include:
1. The aftercooler return water temperature, intake manifold pressure, and any changes to flash file program #180-1736 for emission units 001, 002, and 003.
2. Hours of operation for emission units 001, 002, and 003.
3. Performance test data and results.
4. Results of annual testing from the portable emissions analyzer.
5. Reports of excess emissions.
6. Changes requiring notification to EPA under this section.
7. Calibration and maintenance records, original strip chart, or computer-based recordings;
8. Sampling dates and the times of sampling or measurement;
9. The operating conditions that existed at the time of sampling or measurement;
10. The date analyses were performed;
11. The location where samples were taken;
12. The company or entity that performed the sampling and analyses;
13. The analytical techniques or methods used in the sampling and analysis; and
14. The results of the analyses.
15. Occurrence and duration of any startup, shutdown, or malfunction in the operation of EU 001, 002, and/or 003 or the facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

Compliance Methods for the Above (Description and Citation):
Section 4.0.b. Grand Casino Hinckley keeps records as required by the Title V permit. Engine run data including aftercooler return water temperature, intake manifold pressure, and hours of operation are downloaded and reviewed each month. Copies of performance test data, annual test results, and excess emissions reports are on file.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 4.0.c. Keep the records required by 40 C.F.R. § 63.6655(b) for the continuous monitoring systems required in Section 3.0(a) and (b) of this permit. Such records shall be kept readily available for expeditious review for 5 years following the date of each occurrence, measurement, maintenance, correction action, report, or record.

Compliance Methods for the Above (Description and Citation):
Records from the continuous monitoring system are kept for aftercooler return water temperature, intake manifold pressure, catalyst inlet temperature, and pressure drop across the catalyst.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.a. Test Reports. Within 45 days after completion of a set of NOx emissions measurements, the owner or operator shall submit a copy of the results to the EPA.

Compliance Methods for the Above (Description and Citation):
Section 3.0.r. and 5.0.a. The annual test report was submitted on June 30, 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.b. Low emission strategy. Certify that electronic controls are set for low emission strategy as required by Section 2.0(b)(2)-(7), 3.0(a)-(b), and 4.0(a) in accordance with Sections 4.0 and 5.0.

Compliance Methods for the Above (Description and Citation):
Sections 3.0.a, b., 4.0.a., b., and 5.0.b. The engines are designed and operated using a low emission strategy. Reports and documents have been certified when submitted. Intake manifold pressure and aftercooler return water temperature and continuously monitored. Records of engine operating conditions are kept as required in Section 4.0.a. and b. of the permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.c. Notification Requirement. The owner or operator shall operate and modify the facility only in accordance with the conditions and requirements of this permit. The owner or operator shall notify the EPA prior to: a. installing an emissions unit or source at the Facility that is not listed in Section 1.0 of this permit; b. making a change to a source listed in Section 1.0 that would cause it to deviate from the description of it provided in Section 1.0; or c. making a change to the emission characteristics of a source, including waste heat recovery, in a manner that would increase the ambient impact beyond that which the EPA used when issuing this permit.

Compliance Methods for the Above (Description and Citation):
Section 5.0.c. There have been no installations or modifications of emissions units at the facility that require notification in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.d. Notification of Construction and Startup. The owner or operator shall furnish EPA written notification as follows: 1. A notification of any physical or operational change to EU 001, 002, and 003 or to the existing facility which may increase the emission rate of any air pollutant in major or significant amounts as defined under 40 CFR 52.21, or which would be subject to any applicable emission standard under 40 CFR parts 60, 61, or 63.

Compliance Methods for the Above (Description and Citation):
Section 5.0.d. There have been no physical or operational changes to the facility in 2014 that would increase emissions.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.e. Excess Emissions Report. Report all emissions or operations that exceed or deviate from the requirements of this permit.

Compliance Methods for the Above (Description and Citation):
Section 5.0.e. Six-month monitoring reports were submitted on or before January 30, 2014 and July 30, 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.g. Excess Emissions. Report all emissions or operations that exceed or deviate from the requirements of this permit and that present a potential threat to human health or safety as soon as possible, but no later than 48 hours, after discovery.

Compliance Methods for the Above (Description and Citation):
Section 5.0.g. There have been no excess emissions or deviations from permit requirements that were a threat to human health.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.h. Information Requests. Furnish to the EPA any information the Agency requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit, or to determine compliance with the permit. Upon request, the owner or operator shall furnish to the Agency copies of records required to be kept by this permit.

Compliance Methods for the Above (Description and Citation):
Section 5.0.h. Grand Casino Hinckley has provided to the EPA any information requested to issue the Title V permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.i. Availability of Information. The availability to the public of information provided to, or otherwise obtained by, the EPA shall be governed by 40 CFR part 2.

Compliance Methods for the Above (Description and Citation):
Sections 5.0.i. and 7.0.f. Grand Casino Hinckley has not requested that any submitted information be held confidential as a trade secret.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.j. Certification requirement. Certify all reports, compliance certifications, or other documents submitted to the EPA under this permit.

Compliance Methods for the Above (Description and Citation):
Sections 5.0.a, e., j., l., m., 7.0. b., d., and h. Grand Casino Hinckley has certified any reports or documents submitted to the EPA.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.k. Annual compliance certification. Submit a compliance certification to the EPA to certify compliance or noncompliance with the terms and conditions in this permit. The compliance certification shall be submitted to the EPA Regional office to the Air Enforcement and Compliance Assurance Branch address listed in Section 5.0(n) of this permit. The owner or operator shall submit the compliance certification by January 30th of each year for the previous calendar year.

Compliance Methods for the Above (Description and Citation):
Sections 5.0.k., l. and 7.0.d. Grand Casino Hinckley has submitted the 2013 Annual Compliance Certification on January 30, 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.l. Compliance Certification Report. The compliance certification shall be certified by the responsible official and shall include the information specified in the Title V permit.

Compliance Methods for the Above (Description and Citation):
Sections 5.0.k., l., and 7.0.d. The annual compliance certification reports have been submitted according to permit requirements.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.o. Notification of compliance status for CO. Submit the Notification of Compliance Status containing the results of the initial performance test of Section 3.0(v) of this permit.

Compliance Methods for the Above (Description and Citation):
The results of the initial performance test were submitted December 2, 2013.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.p. Notification of exceedances for CO. Report each instance in which the requirements of Section 2.0(a)(4), (b)(10)-(11), or (c) of this permit, or the applicable general provisions of 40 C.F.R. § 63.1 to 63.15, were not met.

Compliance Methods for the Above (Description and Citation):
Semiannual Compliance Reports were submitted.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 5.0.q. Compliance reports for CO. Submit semiannual reports indicating any deviations (or no deviations) from the requirements of Section 2.0(a)(4), (b)(10)-(11), or (c) of this permit. [40 C.F.R. § 63.6650(a)]. The reports shall be submitted in accordance with the deadlines specified in 40 C.F.R. § 63.6650(b). The reports shall contain the content requirement by 40 C.F.R. § 63.6650(c)-(d).

Compliance Methods for the Above (Description and Citation):
Semiannual Compliance Reports were submitted.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.b. Annual fee payment.

Compliance Methods for the Above (Description and Citation):
Section 7.0.b. The annual fee payment for 2013 emissions was submitted January 30, 2015.

Status (Check one): _X_ Intermittent Compliance ___ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.c. Compliance statement. Comply with all conditions of this Part 71 permit.

Compliance Methods for the Above (Description and Citation):
Sections 5.0.e., k., l., 7.0.c., d. e., k., l. Grand Casino Hinckley is operating in compliance with its permit. Minor deviations from permit conditions were reported in the Six-Month Monitoring Reports and in the annual compliance certification report.

Status (Check one): _X_ Intermittent Compliance ___ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.d. Compliance certifications.

Compliance Methods for the Above (Description and Citation):
Sections 5.0.k., l. and 7.0.d. The annual compliance certification reports have been submitted according to permit requirements.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.e. Schedule of compliance.

Compliance Methods for the Above (Description and Citation):
Section 7.0.e. Grand Casino Hinckley will continue to comply with applicable requirements.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.f. Duty to provide and supplement information.

Compliance Methods for the Above (Description and Citation):
Sections 5.0.h. and 7.0.f. Grand Casino Hinckley has provided to the EPA any information requested to issue the Title V permit.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.p. Inspection and Entry.

Compliance Methods for the Above (Description and Citation):
Sections 7.0.p. EPA did not perform an inspection of the facility in 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.q. Emergency provisions.

Compliance Methods for the Above (Description and Citation):
Sections 7.0.q. No emergencies occurred at the facility during 2014.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 001, 002, 003

Permit Term (Describe requirements and cross-reference)
Section 7.0.s. Permit expiration and renewal.

Compliance Methods for the Above (Description and Citation):
Sections 7.0.s. A permit renewal application is due at least 6 months, but not more than 18 months, before the permit expiration date of 1/29/2016.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 004, 005

40 CFR 63.6585(f)
The stationary RICE must meet the definition of an emergency stationary RICE in § 63.6675, which includes operating according to the provisions specified in § 63.6640(f).

Compliance Methods for the Above (Description and Citation):
The engines are only operated for emergency use and for maintenance and testing.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

Emission Unit ID(s): 004, 005

40 CFR 63.6640(f)
In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. There is no time limit on use in emergency situations. Maintenance checks and readiness testing is limited to 100 hours per year. Emergency engines may be operated for up to 50 hours per year for non-emergency use, but may not be used for non-emergency demand response, peak shaving, or to generate income.

Compliance Methods for the Above (Description and Citation):
The engines are only operated for emergency use and for maintenance and testing. They are tested approximately one hour per month. They are not used for emergency or non-emergency demand response or for peak shaving or as part of a financial arrangement with another entity.

Status (Check one): ___ Intermittent Compliance _X_ Continuous Compliance

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a Apossible exception@ to compliance.@ Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation: 2.0.a.1. Limit NOx emissions at all times to no greater than 6.55 g/BHP-hr per engine, averaged over the duration of the emission performance test or any three consecutive hours.

Emission Units (unit IDs): 001, 002, 003

Deviation Start 05 / 21 / 2014 ____ : ____ End: ____ / ____ / ____ ____ : ____

Date Written Report Submitted 06 / 30 / 2014

Permit Term for Which There was a Deviation:
Section 3.0.b The owner or operator shall continuously monitor the intake manifold pressure for EU 001, 002, and 003.

Emission Units (unit IDs): 001

Deviation Start 01 / 01 / 2014 09 : 15 End: 01 / 01 / 2014 09 : 49

Date Written Report Submitted 07 / 30 / 2014

Permit Term for Which There was a Deviation:
2.0.b.5. The intake manifold pressure of each engine shall be maintained at 28.1 to 76.2 in Hg for 40 to 100 percent load.

Emission Units (unit IDs): 001

Deviation Start 01 / 31 / 2014 09 : 00 End: 01 / 31 / 2014 09 : 15

Date Written Report Submitted 07 / 30 / 2014

Permit Term for Which There was a Deviation:
40 C.F.R. §63.6625(b)(3) The CPMS must collect data at least once every 15 minutes.

Emission Units (unit IDs): 001, 002

Deviation Start 01 / 31 / 2014 08 : 45 End: 01 / 31 / 2014 09 : 18
Deviation Start 02 / 04 / 2014 08 : 52 End: 02 / 04 / 2014 09 : 28

Date Written Report Submitted 07 / 30 / 2014

Permit Term for Which There was a Deviation:
40 C.F.R. §63.6625(b)(3) The CPMS must collect data at least once every 15 minutes.

Emission Units (unit IDs): 003

Deviation Start 01 / 31 / 2014 08 : 44 End: 01 / 31 / 2014 09 : 18
Deviation Start 02 / 04 / 2014 08 : 53 End: 02 / 04 / 2014 09 : 28

Date Written Report Submitted 07 / 30 / 2014

Permit Term for Which There was a Deviation:
40 C.F.R. §63.6640, Table 6 to 40 C.F.R. Part 63, Subpart ZZZZ. 10.a.v. Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.

Emission Units (unit IDs): 003

Deviation Start 01 / 01 / 2014 10 : 23 End: 01 / 01 / 2014 10 : 43
Deviation Start 01 / 15 / 2014 11 : 53 End: 01 / 15 / 2014 11 : 49
Deviation Start 01 / 31 / 2014 08 : 44 End: 01 / 31 / 2014 09 : 18
Deviation Start 03 / 04 / 2014 21 : 53 End: 03 / 05 / 2014 02 : 19
Deviation Start 03 / 22 / 2014 00 : 53 End: 03 / 22 / 2014 00 : 58

Date Written Report Submitted 07 / 30 / 2014

Permit Term (for Which There is a Deviation):
Section 4.0.c. Recordkeeping for CO. The Permittee shall keep the records required by 40 CFR 63.6655(b) for the continuous monitoring systems required in Section 3.0(a) and (b) of this permit.

Emission Units (unit IDs): 001

Deviation Start: 07 / 22 / 2014 13 : 04 End: 07 / 22 / 2014 20 : 17

Date Written Report Submitted 01 / 30 / 2015

Permit Term (for Which There is a Deviation):
Section 4.0.c. Recordkeeping for CO. The Permittee shall keep the records required by 40 CFR 63.6655(b) for the continuous monitoring systems required in Section 3.0(a) and (b) of this permit.

Emission Units (unit IDs): 002

Deviation Start: 7/22/2014 13:04	End: 7/22/2014 20:17
Deviation Start: 7/25/2014 4:55	End: 7/25/2014 11:26
Deviation Start: 7/26/2014 22:12	End: 7/26/2014 23:17
Deviation Start: 7/29/2014 21:42	End: 7/29/2014 22:47
Deviation Start: 8/1/2014 14:29:10	End: 8/1/2014 14:40:11
Deviation Start: 8/3/2014 13:52:04	End: 8/3/2014 14:44:05
Deviation Start: 8/10/2014 18:22:10	End: 8/10/2014 23:04:10
Deviation Start: 8/17/2014 21:39:56	End: 8/17/2014 23:31:20
Deviation Start: 8/18/2014 20:41:37	End: 8/18/2014 22:50:33
Deviation Start: 8/21/2014 5:33:07	End: 8/21/2014 9:48:50
Deviation Start: 8/21/2014 13:46:10	End: 8/21/2014 19:17:18
Deviation Start: 8/24/2014 20:07:41	End: 8/25/2014 1:14:38
Deviation Start: 8/29/2014 8:57:58	End: 8/29/2014 14:10:48
Deviation Start: 8/31/2014 19:40:19	End: 8/31/2014 23:55:19
Deviation Start: 9/1/2014 0:10:34	End: 9/1/2014 3:20:41
Deviation Start: 9/1/2014 20:32:08	End: 9/1/2014 21:35:08
Deviation Start: 9/1/2014 22:00:05	End: 9/2/2014 0:12:44
Deviation Start: 9/3/2014 13:43:59	End: 9/3/2014 21:52:01
Deviation Start: 9/4/2014 6:41:41	End: 9/4/2014 9:10:25
Deviation Start: 9/4/2014 11:50:52	End: 9/4/2014 13:26:07
Deviation Start: 9/9/2014 21:25:59	End: 9/10/2014 0:13:48
Deviation Start: 9/20/2014 17:47:34	End: 9/20/2014 19:39:39
Deviation Start: 9/29/2014 12:01:18	End: 9/29/2014 12:32:48
Deviation Start: 10/13/2014 12:15:20	End: 10/13/2014 12:43:10
Deviation Start: 10/22/2014 10:22:35	End: 10/22/2014 12:46:12
Deviation Start: 10/22/2014 19:07:56	End: 10/22/2014 20:22:40
Deviation Start: 12/2/2014 9:39:10	End: 12/2/2014 10:15:06
Deviation Start: 12/19/2014 15:31:14	End: 12/19/2014 15:50:19

Date Written Report Submitted 01 / 30 / 2015

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

FEE CALCULATION WORKSHEET (FEE)

Use this form initially, or thereafter on an annual basis, to calculate part 71 fees.

A. General Information

Type of fee (Check one): ___Initial _X_Annual

Deadline for submitting fee calculation worksheet 11 / 15 / 2015

For initial fees, emissions are based on (Check one):

___ Actual emissions for the preceding calendar year. (Required in most circumstances.)

___ Estimates of actual emissions for the current calendar year. (Required when operations commenced during the preceding calendar year.)

Date commenced operations ____/____/_____

___ Estimates of actual emissions for the preceding calendar year. (Optional after a part 71 permit was issued to replace a part 70 permit, but only if initial fee payment is due between January 1 and March 31; otherwise use actual emissions for the preceding calendar year.)

For annual fee payment, you are required to use actual emissions for the preceding calendar year.

B. Source Information: Complete this section only if you are paying fees but not applying for a permit.

Source or facility name Grand Casino Hinckley

Mailing address: Street or P.O. Box 777 Lady Luck Drive

City Hinckley State MN ZIP 55037 - _____

Contact person Bradley Kalk Title Vice President of Facilities

Telephone (320) 384 - 4907 Ext_____ Part 71 permit no. V-ML-2711500031-2010-01

C. Certification of Truth, Accuracy and Completeness: Only needed if not submitting a separate form CTAC.

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal (form and attachments) are true, accurate and complete.

Name (signed) _____

Name (typed) _____ Date:____/____/_____

D. Annual Emissions Report for Fee Calculation Purposes -- Non-HAP

You may use this to report actual emissions (tons per year) of regulated pollutants (for fee calculation) on a calendar-year basis for both initial and annual fee calculation purposes. Section E is designed to report HAP emissions. Quantify all actual emissions, including fugitives, but do not include insignificant emissions and certain regulated air pollutants that are not counted for fee purposes, such as CO (see instructions). You may round to the nearest tenth of a ton on this form. Sum the emissions in each column and enter a subtotal at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000 for that column.

This data is for 2014 (year)

Emission Unit ID	NOx	VOC	SO2	PM10	Lead	Other
EU 001	3.9	0.1	0.0	0.1		
EU 002	3.7	0.1	0.0	0.1		
EU 003	3.5	0.1	0.0	0.1		
EU 004	0.1	0.0	0.0	0.0		
EU 005	0.1	0.0	0.0	0.0		
SUBTOTALS	11.2	0.4	0.0	0.3		

E. Annual Emissions Report for Fee Calculation Purposes -- HAP

HAP Identification. Identify individual HAP emitted at the facility, identify the CAS number, and assign a unique identifier for use in the second table in this section. Whenever assigning identifier codes, use "HAP1" for the first, "HAP2" for the second, and so on.

Name of HAP	CAS No	Identifier
Benzene	71432	HAP1
Toluene	108883	HAP2
Xylenes	1330207	HAP3
Formaldehyde	50000	HAP4
Acetaldehyde	75070	HAP5
Acrolein	107028	HAP6
Naphthalene	91203	HAP7

HAP Emissions. Report the actual emissions of individual HAP identified above. Use the identifiers assigned in the table above. Include all emissions, including fugitives, and do not include insignificant emissions. You may round to the nearest tenth of a ton. Sum the emissions in each column and enter a subtotal at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000.

This data is for 2014 (year)

Emissions Unit ID	Actual Emissions (Tons/Year)							
	HAP_1	HAP_2	HAP_3	HAP_4	HAP_5	HAP_6	HAP_7	HAP___
001	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
002	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
003	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
004	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
005	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
SUBTOTALS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	

F. Fee Calculation Worksheet

This section is used to calculate the total fee owed for both initial and annual fee payment purposes. Reconciliation is only for cases where you are paying the annual fee and you used any type of estimate of actual emissions when you calculated the initial fee. If you do not need to reconcile fees, only complete line 1-5 and then skip down to lines 21 – 26. See instructions for more detailed explanation.

1. Sum the emissions from section D of this form (non-HAP) and enter the total (tons).	11.9
2. Sum the emissions from section E of this form (HAP) and enter the total (tons).	0.0
3. Sum lines 1 and 2.	11.9
4. Enter the emissions that were counted twice. If none, enter "0."	0
5. Subtract line 4 from line 3, round to the nearest ton, and enter the result here.	12

RECONCILIATION
(WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "CURRENT" CALENDAR YEAR)

Only complete lines 6-10 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 21.

6. Enter the total estimated actual emissions for the year the initial fee was paid (previously reported on line 5 of the initial fee form).	
7. If line 5 is greater than line 6, subtract line 6 from line 5, and enter the result. Otherwise enter "0."	
8. If line 6 is greater than line 5, subtract line 5 from line 6, and enter the result. Otherwise enter "0."	
9. If line 7 is greater than 0, multiply line 7 by last year's fee rate ($/ton) and enter the result here. This is the underpayment. Go to line 21.	
10. If line 8 is greater than 0, multiply line 8 by last year's fee rate ($/ton) and enter the result here. This is the overpayment. Go to line 21.	

RECONCILIATION
(WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "PRECEDING" CALENDAR YEAR)

Only complete lines 11-20 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year preceding initial fee payment; otherwise skip to line 21. If completing this section, you will also need to complete sections D and E to report actual emissions for the calendar year preceding initial fee payment.

11. Sum the actual emissions from section D (non-HAP) for the calendar year preceding initial fee payment and enter the result here.	
12. Sum the actual emissions from section E (HAP) for the calendar year preceding initial fee payment and enter the result here.	
13. Add lines 11 and 12 and enter the total here. These are total actual emissions for the calendar year preceding initial fee payment.	
14. Enter double counted emission from line 13 here. If none, enter "0."	
15. Subtract line 14 from line 13, round to the nearest ton, and enter the result here.	

16. Enter the total estimated actual emissions previously reported on line 5 of the initial fee form. These are estimated actual emissions for the calendar year preceding initial fee payment.	
17. If line 15 is greater than line 16, subtract line 16 from line 15, and enter the result here. Otherwise enter "0."	
18. If line 16 is greater than line 15, subtract line 15 from line 16, and enter the result here. Otherwise enter "0."	
19. If line 17 is greater than 0, multiply line 17 by last year's fee rate ($/ton) and enter the result here. This is the underpayment.	
20. If line 18 is greater than 0, multiply line 18 by last year's fee rate ($/ton) and enter the result on this line. This is the overpayment.	
FEE CALCULATION	
21. Multiply line 5 (tons) by the current fee rate ($/ton) and enter the result here.	$599.16
22. Enter any underpayment from line 9 or 19 here. Otherwise enter "0."	0
23. Enter any overpayment from line 10 or 20 here. Otherwise enter "0."	0
24. If line 22 is greater than "0," add it to line 21 and enter the result here. If line 23 is greater than "0," subtract this from line 21 and enter the result here. Otherwise enter the amount on line 21 here. This is the fee adjusted for reconciliation.	$599.16
25. If your account was credited for fee assessment error since the last time you paid fees, enter the amount of the credit here. Otherwise enter "0."	0
26. Subtract line 25 from line 24 and enter the result here. Stop here. This is the total fee amount that you must remit to EPA.	$599.16

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

FEE FILING FORM (FF)

Complete this form each time you prepare form **FEE** and send this form to the appropriate lockbox bank address, along with full payment. This form required at time of initial fee payment, and thereafter, when paying annual fees.

Source or Facility Name Grand Casino Hinckley

Source Location 777 Lady Luck Drive, Hinckley, MN 55037

EPA Region where Source Located 5

Mailing Address:

Street/P.O. Box 777 Lady Luck Drive City Hinckley

State MN ZIP 55037 - _____

Contact Person: Bradley Kalk Title Vice President of Facilities

Telephone (320) 384 - 4907 Ext. _____

Total Fee Payment Remitted: $ 599.16

Appendix B

Emissions Calculations

Grand Casino Hinckley
Title V Permit Renewal Application

	2593 bhp
Emissions Calculations	2000 kW
3516B Caterpillar Engines	130.2 gal/hr

Emission Rate	VOC	NOx (Current)	CO	PM	PM10	PM2.5	GHG				SO2	HAPs	NOx (Proposed)
							CO2	CH4	N2O	CO2e			
Emission Factors	(g/hp-hr)	(g/hp-hr)	(g/hp-hr)	(g/hp-hr)	(g/hp-hr)	(g/hp-hr)	(g/hp-hr)	(g/hp-hr)	(g/hp-hr)		(lb/hr)	(lb/hr)	(g/hp-hr)
	0.20	6.55	0.53	0.15	0.12	0.10	508.78	0.02	0.004		0.03	0.03	8.50
Hourly Emissions	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
Per Engine:	1.1	37.4	3.0	0.9	0.7	0.6	2908.4	0.1	0.02	2918.4	0.0	0.0	48.6
Total (3 Engines):	3.4	112.3	9.1	2.6	2.1	1.8	8725.2	0.4	0.1	8755.2	0.1	0.1	145.8
Uncontrolled Potential to Emit	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Per Engine:	5.0	164.0	13.3	3.8	3.1	2.6	12738.8	0.5	0.1	12782.5	0.1	0.1	212.8
Total (3 Engines):	15.0	492.0	39.8	11.3	9.3	7.7	38216.5	1.6	0.3	38347.6	0.4	0.3	638.5
Limited PTE	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Per Engine:	0.5	15.0	1.2	0.3	0.3	0.2	1163.4	0.0	0.0	1167.4	0.0	0.0	19.4
Total (3 Engines):	1.4	44.9	3.6	1.0	0.8	0.7	3490.1	0.1	0.0	3502.1	0.0	0.0	58.3
Actual Emissions	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Per Engine:	0.1	3.9	0.3	0.1	0.1	0.1	328.7	0.0	0.0	329.8	0.0	0.0	5.5
Total (3 Engines):	0.4	11.0	1.0	0.3	0.2	0.2	986.0	0.0	0.0	989.3	0.0	0.0	16.5

Emission factors for NOx (current), VOC, PM and CO were provided by Ziegler for a Caterpillar 3516B engine.
VOC measured as hydrocarbons. Based on 100 percent load.

PM10 and PM2.5 are calculated based on the fraction in PM provided in AP-42, Table 3.4-2, multiplied by the emission factor for PM provided by the engine manufacturer.
0.12 g PM10/hp-hr = 0.0573 lb PM10/MMBtu / 0.0697 lb PM/MMBtu * 0.15 g PM/hp-hr
0.10 g PM2.5/hp-hr = 0.0479 lb PM2.5/MMBtu / 0.0697 lb PM/MMBtu * 0.15 g PM/hp-hr

CO2, CH4, and N20 emission factors are from 40 CFR 98 Appendix C Tables C-1 and C-2

$$EF\left[\frac{kg}{MMBtu}\right] * \left(\frac{0.137MMBtu}{gal}\right) * \left(\frac{130.2gal}{hr}\right) * \left(\frac{1000lb}{453.592kg}\right) = EF\left[\frac{lb}{hr}\right]$$

Global Warming Potentials for calculating CO2e emissions are from 40 CFR 98 Appendix A.

SO2(lb/hr) = 130.2 gal/hr * 7 lb/gal fuel density * 0.0015 part S/100 part fuel * lbmol S/32 lb S * 64 lb SO2/lbmol SO2.

Potential to emit calculations are based on 8,760 hours per year.
Limited PTE calculations are based on 800 hours per year.

Actual Emissions are based on operating hours in 2014.
Generators 001 and 002 operated 226 hours in 2014, Generator 003 operated 225 hours.
226 hours were used for the "per engine" actual emissions to be conservative
Actual NOx emissions are based on performance test results from July 15, 2010.
Engine 1, 34.69 lb/hr, Engine 2, 32.36 lb/hr and Engine 3, 30.73 lb/hr.

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Emissions Calculations
3516B Caterpillar Engines

2593 bhp
2000 kW
130.2 gal/hr

Per Engine: HAPs	Emission Factors (lb/MMBtu)	Actual Emissions (ton/yr)	Uncontrolled Potential to Emit (lb/hr)	Uncontrolled Potential to Emit (tons/yr)	Limited PTE (tons/yr)
Benzene	7.76E-04	0.0016	0.0138	0.0605	0.0055
Toluene	2.81E-04	0.0006	0.0050	0.0219	0.0020
Xylenes	1.93E-04	0.0004	0.0034	0.0151	0.0014
Formaldehyde	7.89E-05	0.0002	0.0014	0.0062	0.0006
Acetaldehyde	2.52E-05	0.0001	0.0004	0.0020	0.0002
Acrolein	7.88E-06	0.0000	0.0001	0.0006	0.0001
Naphthalene	1.30E-04	0.0003	0.0023	0.0101	0.0009
Total HAPs	1.49E-03	0.0030	0.0266	0.1164	0.0106

3 Engines Total: HAPs	Emission Factors (lb/MMBtu)	Actual Emissions (ton/yr)	Uncontrolled Potential to Emit (lb/hr)	Uncontrolled Potential to Emit (tons/yr)	Limited PTE (tons/yr)
Benzene	7.76E-04	0.0141	0.0415	0.1816	0.0166
Toluene	2.81E-04	0.0051	0.0150	0.0658	0.0060
Xylenes	1.93E-04	0.0035	0.0103	0.0452	0.0041
Formaldehyde	7.89E-05	0.0014	0.0042	0.0185	0.0017
Acetaldehyde	2.52E-05	0.0005	0.0013	0.0059	0.0005
Acrolein	7.88E-06	0.0001	0.0004	0.0018	0.0002
Naphthalene	1.30E-04	0.0024	0.0069	0.0304	0.0028
Total HAPs	1.49E-03	0.0270	0.0797	0.3492	0.0319

HAP emission factors are from AP-42, Table 3.4-3 and Table 3.4-4.

The heat capacity of fuel oil is 137,000 Btu/gal based on Appendix A of AP-42.
130 gal/hr * 137,000 Btu/gal = 17.81 MMBtu/hr at peak engine capacity.

Potential to emit calculations are based on 8,760 hours per year.
Limited PTE calculations are based on 800 hours per year.

Actual Emissions are based on operating hours in 2014.
Engines 1 and 2 each operated 226 hours in 2014.
Engine 3 operated 225 hours in 2014.

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Emergency Generators:

CUMMINS	535 hp	EU 004
V-16 Detroit	960 hp	EU 005

Emission Rate	VOC[a]	NOx	CO	PM	PM10	PM2.5	GHG				SO_2[b]	HAPs
							CO2	CH4	N2O	CO2e		
Emission Factors	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hr)	(lb/hr)		(lb/hp-hr)	(lb/MMBtu)
535 HP Engine:	0.00251	0.031	0.00668	0.0022	0.0022	0.0022	1.15	0.02	0.01		0.00205	0.00367
960 HP Engine:	0.00064	0.024	0.0055	0.0007	0.0004	0.0004	1.16	0.04	0.01		0.000012	0.00149
Hourly Emissions	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
535 HP Engine:	1.3	16.6	3.6	1.2	1.2	1.2	615.3	0.0	0.0	618.5	1.1	0.0
960 HP Engine:	0.6	23.0	5.3	0.7	0.4	0.4	1113.6	0.0	0.0	1117.4	0.0	0.0
Total:	2.0	39.6	8.9	1.8	1.6	1.6	1728.9	0.1	0.0	1735.9	1.1	0.0
Potential to Emit	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
535 HP Engine:	0.3	4.1	0.9	0.3	0.3	0.3	153.8	0.0	0.0	154.6	0.3	0.0
960 HP Engine:	0.2	5.8	1.3	0.2	0.1	0.1	278.4	0.0	0.0	279.3	0.0	0.0
Total:	0.5	9.9	2.2	0.5	0.4	0.4	432.2	0.0	0.0	434.0	0.3	0.0
Actual Emissions	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
535 HP Engine:	0.01	0.08	0.02	0.01	0.01	0.01	3.08	0.00	0.00	3.1	0.01	0.00
960 HP Engine:	0.00	0.12	0.03	0.00	0.00	0.00	5.57	0.00	0.00	5.6	0.00	0.00
Total:	0.01	0.20	0.04	0.01	0.01	0.01	8.64	0.00	0.00	8.7	0.01	0.00

a - VOC emission factor found by adding the TOC emission factors together.
b - Assuming 15 ppm (0.0015%) sulfur in Diesel fuel.

EPA's AP-42 Emission Factors for the 535 HP Engine from Tables 3.3-1 and 3.3-2:
http://www.epa.gov/ttnchie1/ap42/ch03/final/c03s03.pdf
EPA's AP-42 Emission Factors for the 960 HP Engine from Tables 3.4-1, 3.4-2, and 3.4-3:
http://www.epa.gov/ttnchie1/ap42/ch03/final/c03s04.pdf
40 CFR 98 Emission factors for the GHG (CO2 from EPA's AP-42):
http://www.ecfr.gov/cgi-bin/text-idx?SID=6b02fdcaf51e44dd474250155cba9941&mc=true&node=ap40.21.98_138.2&rgn=div9

Potential to emit calculations are based on 500 hours per year for emergency engines.
Actual emissions are based on 10 hours per year of actual run time.

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535 HP	Emission Factors	Actual Emissions	Uncontrolled Potential to Emit	
HAPs	(lb/MMBtu)	(ton/yr)	(lb/hr)	(tons/yr)
Benzene	9.33E-04	0.0019	0.0166	0.0042
Toluene	4.09E-04	0.0008	0.0073	0.0018
Xylenes	2.85E-04	0.0006	0.0051	0.0013
Formaldehyde	1.18E-03	0.0024	0.0210	0.0053
Acetaldehyde	7.67E-04	0.0015	0.0137	0.0034
Acrolein	9.25E-06	0.0000	0.0002	0.0000
Naphthalene	8.48E-05	0.0002	0.0015	0.0004
Total HAPs	3.67E-03	0.0074	0.0653	0.0163

960 HP	Emission Factors	Actual Emissions	Uncontrolled Potential to Emit	
HAPs	(lb/MMBtu)	(ton/yr)	(lb/hr)	(tons/yr)
Benzene	7.76E-04	0.0016	0.0138	0.0035
Toluene	2.81E-04	0.0006	0.0050	0.0013
Xylenes	1.93E-04	0.0004	0.0034	0.0009
Formaldehyde	7.89E-05	0.0002	0.0014	0.0004
Acetaldehyde	2.52E-05	0.0001	0.0004	0.0001
Acrolein	7.88E-06	0.0000	0.0001	0.0000
Naphthalene	1.30E-04	0.0003	0.0023	0.0006
Total HAPs	1.49E-03	0.0030	0.0266	0.0066

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Total Facility Summary

Emission Rate	VOC	NOx (Current)	CO	PM	PM10	PM2.5	GHG				SO2	HAPs	NOx (Proposed)
							CO2	CH4	N2O	CO2e			
Hourly Emissions	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
Main Generators	3.4	112.3	9.1	2.6	2.1	1.8	8725.2	0.4	0.1	8755.2	0.1	0.1	145.8
Emergency Generators:	2.0	39.6	8.9	1.8	1.6	1.6	1728.9	0.1	0.0	1735.9	1.1	0.0	39.6
Total Facility:	5.4	152.0	17.9	4.4	3.7	3.3	10454.1	0.4	0.1	10491.0	1.2	0.1	185.4
Uncontrolled Potential to Emit	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Main Generators	15.0	492.0	39.8	11.3	9.3	7.7	38216.5	1.6	0.3	38347.6	0.4	0.3	638.5
Emergency Generators:	0.5	9.9	2.2	0.5	0.4	0.4	432.2	0.0	0.0	434.0	0.3	0.0	9.9
Total Facility:	15.5	501.9	42.0	11.7	9.7	8.1	38648.7	1.6	0.3	38781.6	0.6	0.4	648.4
Limited Potential to Emit	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Main Generators	1.4	44.9	3.6	1.0	0.8	0.7	3490.1	0.1	0.0	3502.1	0.0	0.0	58.3
Emergency Generators:	0.5	9.9	2.2	0.5	0.4	0.4	432.2	0.0	0.0	434.0	0.3	0.0	9.9
Total Facility:	1.9	54.8	5.8	1.5	1.2	1.1	3922.3	0.2	0.0	3936.0	0.3	0.0	68.2
Actual Emissions	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Main Generators	0.39	11.03	1.03	0.29	0.24	0.20	985.95	0.04	0.01	989.33	0.01	0.01	11.03
Emergency Generators:	0.01	0.20	0.04	0.01	0.01	0.01	8.64	0.00	0.00	8.68	0.01	0.00	0.20
Total Facility:	0.40	11.23	1.07	0.30	0.25	0.21	994.59	0.04	0.01	998.01	0.01	0.01	11.23